

JEREMY W. KATZ (SBN: 119418)  
LINDA SORENSEN (SBN: 72753)  
PINNACLE LAW GROUP LLP  
425 California Street, Suite 1800  
San Francisco, CA 94104  
Email: jkatz@pinnaclelawgroup.com  
Telephone: (415) 394-5700  
Facsimile: (415) 394-5003

Attorneys for Trustee  
PAUL J. MANSDORF

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re:

PICONGEN WIRELESS INC.,  
Debtor.

Case No. 12-48131 RLE 7

Chapter 7

MOTION FOR ORDER APPROVING  
COMPROMISE OF CONTROVERSY WITH  
SIGMA GROUP, INC.

Date: May 6, 2013  
Time: 1:00 p.m.  
Room: 201, Judge Efremsky

Paul J. Mansdorf, Trustee of the above-named Debtor's bankruptcy estate (the "Trustee"), hereby moves the Court for an Order authorizing him to enter into a compromise of controversy with Sigma Group, Inc. ("Sigma Group") resolving Adversary Proceeding No. 13-04064, *Mansdorf v. Sigma Group* (the "Action"), on the terms set forth in the memorandum of points and authorities and in the Settlement Agreement attached as Exhibit "A" to the Trustee's declaration in support of the Motion. The proposed compromise ends litigation concerning the sale to and purchase by Sigma Group of substantially all of the assets of the bankruptcy estate.

///

///

///

1 The Motion is made pursuant Bankruptcy Code § 9019, B.L.R 9014-1(c)(2), the notice of  
2 motion, the motion, the memorandum of points and authorities, the supporting declaration, and  
3 any evidence that the Court requests or requires prior to or at the hearing on the Motion.

4 Dated: April 15, 2013

PINNACLE LAW GROUP LLP

5 By: Jeremy W. Katz  
6 JEREMY W. KATZ  
7 Attorneys for Trustee Paul J. Mansdorf  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28